

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SHANIECE MATTHEWS, as guardian <i>ad</i> ,	)	
<i>litem</i> and on behalf of her son D.W.,	)	
	)	
Plaintiff,	)	
	)	No. 18 CV 6675
v.	)	Judge Joan B. Gottschall
	)	
The State of Illinois et al.,	)	
	)	
Defendants.	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY  
TO DEFENDANTS’ OPPOSITION TO MOTION TO CERTIFY**

Plaintiff Shaniece Mathews, by her undersigned counsel, respectfully requests an extension of time to reply to Defendants’ Opposition to Plaintiff’s Motion for Class Certification. For the reply brief currently due on August 11, 2022, Plaintiff seeks a one-week extension of time to August 18, 2022. In support of this motion Plaintiff states:

1. Plaintiff filed a motion for class certification. Defendants filed their response on July 7, 2022, and Plaintiff’s reply is currently due August 11, 2022.
2. Plaintiff’s undersigned counsel has not been working a normal schedule in the past two weeks due to a health-related condition resulting from surgery and has been unable to turn full attention to a reply brief until now.
3. The delay will not prejudice the Defendants.
4. Defendants have no objection to this motion.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests an extension of time to August 18, 2022, to file their reply brief in support of their motion for class certification.

Respectfully submitted,

Dated: August 9, 2022

By: /s/ Thomas H. Geoghegan  
One of Plaintiff's Attorneys

Thomas H. Geoghegan  
Michael P. Persoon  
Willem Bloom  
**Despres, Schwartz & Geoghegan, Ltd.**  
77 West Washington Street, Suite 711  
Chicago, Illinois 60602  
(312) 372-2511  
admin@dsgchicago.com

Kelly Nicole Sampson (*pro hac vice* forthcoming)  
Shira Lauren Feldman  
**Brady Center to Prevent Gun Violence**  
840 First Street NE, Suite 400  
Washington, DC 20002  
(202) 370-8100  
ksampson@bradyunited.org  
sfeldman@bradyunited.org

Attorneys for the Plaintiff